



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7  
25 FUNSTON ROAD  
KANSAS CITY, KANSAS 66115

REC'D

MAY 13 1999

RESP

MAY 13 1999

MEMORANDUM

SUBJECT: Transmittal of Inspection Report -RCRA

FROM: Betty Berry, Branch Manager  
ARCM/ENSV

TO: Jo Ann Heiman, Branch Manager  
RESP/ARTD

This memorandum transmits the following inspection report conducted by the  
Environmental Services Division:

Type: Compliance Evaluation Inspection	Inspection Date: 03/24/99
Facility Name: Bristol Steel	Facility I.D. Number: MOR000008300
Address: 3117 Big Bend Road St. Louis, Missouri	Activity Number: N/A
Facility Activity: No Facility	SIC Code: 9199
Environmental Justice: Was the inspection conducted in a potential EJ area? N/A	
Multimedia: Screening checklist completed? No (Or: Level C multimedia inspection completed involving Air & RCRA.) No	
Small Business Regulatory Enforcement Fairness Act (SBREFA): N/A	
Preliminary Findings: None	
Comments: Facility was a Superfund site. Facility is no longer there.	

Attachments



R00128560  
RCRA RECORDS CENTER





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7  
25 FUNSTON ROAD  
KANSAS CITY, KANSAS 66115

MEMORANDUM

SUBJECT: RCRA Inspection of Bristol Steel  
EPA ID# MOR000008300

FROM: Clint Sperry *Clint Sperry*  
Environmental Scientist, ARCM

TO: Jo Ann Heiman  
Chief, RCRA Enforcement & State Programs Branch, RESP

THRU: Betty Berry  
Chief, Air & RCRA Compliance Branch, ARCM

At the request of the Air, RCRA and Toxics Division (ARTD), a RCRA Compliance Evaluation Inspection was performed at Bristol Steel on March 24, 1999. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. This report and attachments present the inspection results.

On March 24, 1999, I arrived at 3117 Big Bend road. The address had been listed on the notification form and RCRIS as the location of the Bristol Steel facility. However, once on-site, the 3117 Big Bend address belonged to Grace & Company, a CPA firm. I spoke with Mr. Larry Porchen, (CPA) who stated the firm had been at this address for more than 10 years and the building occupants before them were medical personnel. He stated that he had never heard of Bristol Steel and that I should talk with G.T. Cozad, the building owner.

G.T. Cozad is the real estate manager for Sunquad Corporation. Mr. Cozad said that he was familiar with Bristol Steel, but said I should talk with Mr. Mike Miller. Mr. Miller is the Facilities and Operations Director for Sunquad Corporation. I went to Mr. Miller's office which is located at 7850 Manchester, St. Louis, MO. Mr. Miller said that Sunquad Corp. is a wholly-owned subsidiary of Sunnen Corp., which is a manufacturer of honing equipment.

Mr. Miller said that Bristol Steel was a steel company which had operated at the 3117 site until around 1986. During that time, Bristol Steel had their driveway sprayed for dust suppression by Mr. Bliss. Mr. Bliss was the individual that picked up dioxin

contaminated oil and used it for dust suppression around the St. Louis metropolitan area. Since Mr. Bliss was not able to afford the clean-up of the dioxin contaminated sites, they became Superfund sites.

The Bristol Steel site was sold to the Sunquad Corp. in 1982. According to Mr. Miller, Sunquad knew of the dioxin contamination and that it was part of the purchase agreement. In August of 1996, 948 cubic yards of dioxin contaminated dirt was excavated and stored in a 60' X 100' metal building. In September of 1996, the dioxin contaminated dirt was removed and transported to Times Beach where it was incinerated. In October of 1996, the building was certified clean closed by the EPA. And, in November of 1996, the metal building was removed. I viewed the site of the metal building and it is no longer there.

For documentation of the above listed information, please see attachment 1. Attachment 1 also contains information of the closure process and a copy of the lab analysis of the metal storage building. No other information was received at this time and the inspection was concluded.

Attachments



yellow

MAY 13 1999

MEMORANDUM

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ARCM/ENSV

TO: Jo Ann Heiman, Branch Manager  
RESP/ARTD

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Preliminary Findings: None	
Comments: Facility was a Superfund site. Facility is no longer there.	

Attachments

C.Sperry:dl:05/07/99

ARCM

ARCM

*C. Sperry*  
5/7/99

MEMORANDUM

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EPA ID# MOR000008300

FROM: Clint Sperry  
Environmental Scientist, ARCM

TO: Jo Ann Heiman  
Chief, RCRA Enforcement & State Programs Branch, RESP

THRU: Betty Berry  
Chief, Air & RCRA Compliance Branch, ARCM

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*yellow*

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Attachments

Csperry

ARCM

ARCM

*Csperry*  
5/7/99





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
726 MINNESOTA AVENUE  
KANSAS CITY, KANSAS 66101

OCT 10 1996

Mr. Mike Miller  
Sunnen Corporation  
7910 Manchester Ave.  
St. Louis, Missouri 63143

Dear Mr. Miller:

This letter is to inform you that the Environmental Protection Agency (EPA) has completed its removal action at the Bristol Steel Site located in Maplewood, Missouri. The following is a brief description of the removal activities:

Between August 21 and August 29, 1996, EPA's dioxin excavation and transportation contractor (Earth Tech) removed 512 bags of dioxin-contaminated soil totaling 1637.93 tons from the storage building. These bags were delivered to the thermal treatment facility at Times Beach.

Upon completion of the bag removal, sampling for dioxin was conducted in three areas of the building to determine if decontamination of the storage building was necessary. Ten dust samples were taken from the floor, four wipe samples were taken (one from the sheet metal from each side of the interior of the building) and one dust sample (one aliquot from each rafter) was taken from the rafters for a total of 15 samples. The rafters and wall samples were non-detect at the detection limit for dioxin. The floor samples came back positive.

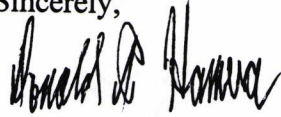
Another EPA contractor (Smith/Reidel) was brought on-site to decontaminate the floor. Since the rafter and wall samples were non-detect only the floor of the building underwent the decontamination process. Crews began and completed the decontamination of the floor on Thursday, September 12, 1996. Four confirmation wipe samples were then taken from the floor. All of these samples came back non-detect at the detection limits for dioxin. The validated data package is attached.

The analytical results show the building is not contaminated with dioxin at levels above the detection limits. Based on this sampling data, the Agency for Toxic Substances and Disease Registry has concurred that dioxin does not pose a health threat in this building.

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Should you have any questions with regard to any of the above information, please contact me at (913) 551-7818.

Sincerely,

A handwritten signature in black ink, appearing to read "Donald F. Hamera". The signature is stylized with a large, prominent "H" and "D".

Donald F. Hamera  
On-Scene Coordinator  
Emergency Response and Removal Branch

Attachments



## ANALYSIS REQUEST REPORT

VALIDATED DATA

FOR ACTIVITY: GZ1AL

HAMERA, DON

10/01/96 16:12:24

ALL REAL SAMPLES AND FIELD Q.C.

## \* FINAL REPORT

FY: 96 ACTIVITY: GZ1AL DESCRIPTION: BRISTOL STEEL LOCATION: MAPLEWOOD MISSOURI  
 STATUS: ACTIVE TYPE: SAMPLING - IN HOUSE ANALYSIS PROJECT: L33  
 LABO DUE DATE IS 11/ 7/96. REPORT DUE DATE IS 9/28/96.  
 INSPECTION DATE: 8/14/96 ALL SAMPLES RECEIVED DATE: 09/23/96  
 ALL DATA APPROVED BY LABO DATE: 09/30/96 FINAL REPORT TRANSMITTED DATE: 10/01/96  
 EXPECTED LABO TURNAROUND TIME IS 45 DAYS EXPECTED REPORT TURNAROUND TIME IS 45 DAYS  
 ACTUAL LABO TURNAROUND TIME IS 7 DAYS ACTUAL REPORT TURNAROUND TIME IS 48 DAYS  
 SITE CODE: AL SITE: BRISTOL STEEL

SAMP. NO.	QCC	M	DESCRIPTION	SAMPLE # STATUS	CITY	STATE	AIRS/ STORET LOC NO	LAY- SECT	ER	BEG. DATE	BEG. TIME	END. DATE	END. TIME
001	S		SEDIMENT FROM BAG BUILDING FLOOR	1	MAPLEWOOD	MISSOURI				08/08/96	11:20	/ /	:
002	A		AIR MONITOR BS-1	1	MAPLEWOOD	MISSOURI				08/21/96	05:00	08/24/96	05:00
003	S		FLOOR-CELL 1	1	MAPLEWOOD	MISSOURI				08/29/96	14:00	/ /	:
004	S		FLOOR-CELL 2	1	MAPLEWOOD	MISSOURI				08/29/96	14:10	/ /	:
005	S		FLOOR-CELL 3	1	MAPLEWOOD	MISSOURI				08/29/96	14:20	/ /	:
006	S		FLOOR-CELL 4	1	MAPLEWOOD	MISSOURI				08/29/96	14:30	/ /	:
007	S		FLOOR-CELL 5	1	MAPLEWOOD	MISSOURI				08/29/96	14:40	/ /	:
008	S		FLOOR-CELL 6	1	MAPLEWOOD	MISSOURI				08/29/96	14:50	/ /	:
009	S		FLOOR-CELL 7	1	MAPLEWOOD	MISSOURI				08/29/96	15:00	/ /	:
009	D	S	FLOOR-CELL 7-SPLIT	1	MAPLEWOOD	MISSOURI				08/29/96	15:00	/ /	:
010	S		FLOOR-CELL 8	1	MAPLEWOOD	MISSOURI				08/29/96	15:00	/ /	:
011	S		FLOOR-CELL 9	1	MAPLEWOOD	MISSOURI				08/29/96	15:00	/ /	:
012	S		FLOOR-CELL 10	1	MAPLEWOOD	MISSOURI				08/29/96	15:00	/ /	:
013	H		SOUTH WALL	1	MAPLEWOOD	MISSOURI				08/29/96	15:30	/ /	:
014	H		NORTH WALL	1	MAPLEWOOD	MISSOURI				08/29/96	15:35	/ /	:
015	H		EAST WALL	1	MAPLEWOOD	MISSOURI				08/29/96	15:40	/ /	:
016	H		WEST WALL	1	MAPLEWOOD	MISSOURI				08/29/96	15:45	/ /	:
017	S		RAFTERS OF BUILDING	1	MAPLEWOOD	MISSOURI				08/30/96	:	/ /	:
018	A		BS-1	1	MAPLEWOOD	MISSOURI				08/26/96	05:00	08/29/96	06:45
020	F	S	FIELD BLANK AUDIT	1	MAPLEWOOD	MISSOURI				08/29/96	00:00	/ /	:
021	H		SOUTH - WEST QUAD OF FLOOR	1	ST LOUIS	MISSOURI				09/12/96	13:09	/ /	:
022	H		SOUTH - EAST QUAD OF FLOOR	1	ST LOUIS	MISSOURI				09/12/96	13:23	/ /	:
023	F	H	FIELD BLANK	1	ST LOUIS	MISSOURI				09/12/96	13:23	/ /	:

VALIDATED DATA

SAMP. NO.	QCC	M	DESCRIPTION	SAMPLE # STATUS	CITY	STATE	AIRS/ STORET LOC NO	LAY- SECT ER	BEG. DATE	BEG. TIME	END. DATE	END. TIME
024	H		WIPE, FLOOR, N-W QUAD OF BUILDING	1	ST LOUIS	MISSOURI			09/13/96	10:50	/ /	:
025	H		WIPE, FLOOR, N-E QUAD OF BUILDING	1	ST LOUIS	MISSOURI			09/13/96	10:57	/ /	:
026	H		VAC TRUCK P52861 VT35/81 AFTER DECON	1	MAPLEWOOD	MISSOURI			09/25/96	12:14	/ /	:

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# EXPLANATION OF CODES AND INFORMATION ON ANALYSIS REQUEST DETAIL REPORT

## SAMPLE INFORMATION:

**SAMP. NO.** = SAMPLE IDENTIFICATION NUMBER (A 3-DIGIT NUMBER WHICH IN COMBINATION WITH THE ACTIVITY NUMBER AND QCC, PROVIDES AN UNIQUE NUMBER FOR EACH SAMPLE FOR IDENTIFICATION PURPOSES)

**QCC** = QUALITY CONTROL CODE (A ONE-LETTER CODE USED TO DESIGNATE SPECIFIC QC SAMPLES. THIS FIELD WILL BE BLANK FOR ALL NON-QC OR ACTUAL SAMPLES):

B = CAL INCREASED CONCENTRATION FOR A LAB SPIKED DUP SAMPLE  
D = MEASURED VALUE FOR FIELD DUPLICATE SAMPLE  
F = MEASURED VALUE FOR FIELD BLANK  
G = MEASURED VALUE FOR METHOD STANDARD  
H = TRUE VALUE FOR METHOD STANDARD  
K = CAL INCREASED CONCENTRATION FOR FIELD SPIKED DUP SAMPLE  
L = MEASURED VALUE FOR A LAB DUPLICATE SAMPLE  
M = MEASURED VALUE FOR LAB BLANK  
N = MEASURED CONCENTRATION OF FIELD SPIKED DUPLICATE  
P = MEASURED VALUE FOR PERFORMANCE STANDARD  
R = CAL INCREASED CONCENTRATION RESULTING FROM LAB SPIKE  
S = MEASURED CONCENTRATION OF LAB SPIKED SAMPLE  
T = TRUE VALUE OF PERFORMANCE STANDARD  
W = MEASURED CONCENTRATION OF LAB SPIKED DUPLICATE  
Y = MEASURED CONCENTRATION OF FIELD SPIKED SAMPLE  
Z = CAL INCREASED CONCENTRATION RESULTING FROM FIELD SPIKE  
1 = MEASURED VALUE OF FIRST SPIKED REPLICATE  
2 = MEASURED VALUE OF SECOND SPIKED REPLICATE  
3 = MEASURED VALUE OF THIRD SPIKED REPLICATE  
4 = MEASURED VALUE OF FOURTH SPIKED REPLICATE  
5 = MEASURED VALUE OF FIFTH SPIKED REPLICATE  
6 = MEASURED VALUE OF SIXTH SPIKED REPLICATE  
7 = MEASURED VALUE OF SEVENTH SPIKED REPLICATE

**M** = MEDIA CODE (A ONE-LETTER CODE DESIGNATING THE MEDIA OF THE SAMPLE):

A = AIR H = HAZARDOUS WASTE/OTHER  
S = SOLID (SOIL, SEDIMENT, SLUDGE)  
T = TISSUE (PLANT & ANIMAL)  
W = WATER (GROUND WATER, SURFACE WATER, WASTE WATER, DRINKING WATER)

**DESCRIPTION** = A SHORT DESCRIPTION OF THE LOCATION WHERE SAMPLE WAS COLLECTED

**AIRS/STORET LOC. NO.** = THE SPECIFIC LOCATION ID NUMBER OF EITHER OF THESE NATIONAL DATABASE SYSTEMS, AS APPROPRIATE

**DATE/TIME INFORMATION** = SPECIFIC INFORMATION REGARDING WHEN THE SAMPLE WAS COLLECTED

BEG. DATE = DATE SAMPLING WAS STARTED  
BEG. TIME = TIME SAMPLING WAS STARTED  
END DATE = DATE SAMPLING WAS COMPLETED  
END TIME = TIME SAMPLING WAS COMPLETED

NOTE: A GRAB SAMPLE WILL CONTAIN ONLY BEG. DATE/TIME  
A TIMED COMPOSITE SAMPLE WILL CONTAIN BOTH BEG AND END DATE/TIME TO DESIGNATE DURATION OF SAMPLE COLLECTION

## OTHER CODES

V = VALIDATED

## ANALYTICAL RESULTS/MEASUREMENTS INFORMATION:

**COMPOUND** = MGP (MEDIA-GROUP-PARAMETER) CODE AND NAME OF THE MEASURED CONSTITUENT OR CHARACTERISTIC OF EACH SAMPLE

**UNITS** = SPECIFIC UNITS IN WHICH RESULTS ARE REPORTED:

C = CENTIGRADE (CELSIUS) DEGREES  
CFS = CUBIC FEET PER SECOND  
GPM = GALLONS PER MINUTE  
IN = INCHES  
I.D. = SPECIES IDENTIFICATION  
KG = KILOGRAM  
L = LITER  
LB = POUNDS  
MG = MILLIGRAMS (1 X 10-3 GRAMS)  
MGD = MILLION GALLONS PER DAY  
MPH = MILES PER HOUR  
MV = MILLIVOLT  
M/F = MALE/FEMALE  
M2 = SQUARE METER  
M3 = CUBIC METER  
NA = NOT APPLICABLE  
NG = NANOGRAMS (1 X 10-9 GRAMS)  
NTU = NEPHELOMETRIC TURBIDITY UNITS  
PC/L = PICO (1 X 10-12) CURRIES PER LITER  
PG = PICOGRAMS (1 X 10-12 GRAMS)  
P/CM2 = PICOGRAMS PER SQUARE CENTIMETER  
SCM = STANDARD CUBIC METER (1 ATM, 25 C)  
SQ FT = SQUARE FEET  
SU = STANDARD UNITS (PH)  
UG = MICROGRAMS (1 X 10-6 GRAMS)  
UMHOS = MICROMHOS/CM (CONDUCTIVITY UNITS)  
U/CC2 = MICROGRAMS PER 100 SQUARE CENTIMETERS  
U/CM2 = MICROGRAMS PER SQUARE CENTIMETER  
1000G = 1000 GALLONS  
+/- = POSITIVE/NEGATIVE  
# = NUMBER

**DATA QUALIFIERS** = SPECIFIC CODES USED IN CONJUNCTION WITH DATA VALUES TO PROVIDE ADDITIONAL INFORMATION ON THE REPORTED RESULTS, OR USED TO EXPLAIN THE ABSENCE OF A SPECIFIC VALUE:

BLANK = IF FIELD IS BLANK, NO REMARKS OR QUALIFIERS ARE PERTINENT. FOR FINAL REPORTED DATA, THIS MEANS THAT THE VALUES HAVE BEEN REVIEWED AND FOUND TO BE ACCEPTABLE FOR USE.

I = INVALID SAMPLE/DATA - VALUE NOT REPORTED  
J = DATA REPORTED BUT NOT VALID BY APPROVED QC PROCEDURES  
K = ACTUAL VALUE OF SAMPLE IS < VALUE REPORTED  
L = ACTUAL VALUE OF SAMPLE IS > VALUE REPORTED  
M = DETECTED BUT BELOW THE LEVEL OF REPORTED VALUE FOR ACCURATE QUANTIFICATION  
O = PARAMETER NOT ANALYZED  
U = ACTUAL VALUE OF SAMPLE IS < THE MEASUREMENT DETECTION LIMIT (REPORTED VALUE)



## ANALYSIS REQUEST DETAIL REPORT

ACTIVITY: 6-GZ1AL

VALIDATED DATA

COMPOUND	UNITS	001	002	003	004	005	
AD01 DIOXIN, 2378-TETRACHLORODIBENZO-P, RAPI	PG/M3		:0.938	UV:			
SD02 DIOXIN, 2378-TETRACHLORODIBENZO-P, RAPI	NG/GM	0.300	UV:	:2.04	V:2.40	V:0.924	V:
ZZ01 SAMPLE NUMBER	:NA	:001	V:002	V:003	V:004	V:005	V:
ZZ02 ACTIVITY CODE	:NA	:GZ1AL	V:GZ1AL	V:GZ1AL	V:GZ1AL	V:GZ1AL	V:
ZZ11 ANALYSIS DATE (MM/DD/YY) - ANALYSIS TIM:		:08/08/96 1932	:08/28/96 1734	:08/31/96 1620	:08/31/96 1634	:08/31/96 1648	

1-1

## ANALYSIS REQUEST DETAIL REPORT

ACTIVITY: 6-GZ1AL

VALIDATED DATA

COMPOUND	UNITS	006	007	008	009	009 D
SD02 DIOXIN, 2378-TETRACHLORODIBENZO-P, RAPI	NG/GM	2.79	V:0.633	V:1.05	V:2.34	V:2.32
ZZ01 SAMPLE NUMBER	:NA	:006	V:007	V:008	V:009	V:009
ZZ02 ACTIVITY CODE	:NA	:GZ1AL	V:GZ1AL	V:GZ1AL	V:GZ1AL	V:GZ1AL
ZZ11 ANALYSIS DATE (MM/DD/YY) - ANALYSIS TIM		:08/31/96 1702	:08/31/96 1716	:09/03/96 1456	:08/31/96 1744	:08/31/96 1758

## ANALYSIS REQUEST DETAIL REPORT

ACTIVITY: 6-GZ1AL

VALIDATED DATA

COMPOUND	UNITS	010	011	012	013	014
HD03 DIOXIN, 2378-TETRACHLORODIBENZO-P, WIPE:PGCM2:					0.400	UV:0.400 UV:
SD02 DIOXIN, 2378-TETRACHLORODIBENZO-P, RAPI:NG/GM:	2.25	V:5.55	V:INVALID			
ZZ01 SAMPLE NUMBER	:NA	:010	V:011	V:012	V:013	V:014 V:
ZZ02 ACTIVITY CODE	:NA	:GZ1AL	V:GZ1AL	V:GZ1AL	V:GZ1AL	V:GZ1AL V:
ZZ11 ANALYSIS DATE (MM/DD/YY) - ANALYSIS TIM:		:08/31/96 1812	:08/31/96 1827	:09/04/96 1426	:08/31/96 1547	:08/31/96 1604

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## ANALYSIS REQUEST DETAIL REPORT

ACTIVITY: 6-GZ1AL

VALIDATED DATA

COMPOUND	UNITS	015	016	017	018	020 F
AD01 DIOXIN, 2378-TETRACHLORODIBENZO-P, RAPI:PG/M3:					:0.870	UV:
HD03 DIOXIN, 2378-TETRACHLORODIBENZO-P, WIPE:PGCM2:0.400			UV:0.400	UV:		
SD02 DIOXIN, 2378-TETRACHLORODIBENZO-P, RAPI:NG/GM:				:0.300	UV:	:0.300 UV:
ZZ01 SAMPLE NUMBER	:NA	:015	V:016	V:017	V:018	V:020 V:
ZZ02 ACTIVITY CODE	:NA	:GZ1AL	V:GZ1AL	V:GZ1AL	V:GZ1AL	V:GZ1AL V:
ZZ11 ANALYSIS DATE (MM/DD/YY) - ANALYSIS TIM:		:08/31/96 1621	:08/31/96 1637	:08/31/96 1857	:09/05/96 2159	:08/31/96 1551

6-1

## ANALYSIS REQUEST DETAIL REPORT

ACTIVITY: 6-GZ1AL

VALIDATED DATA

COMPOUND	UNITS	021	022	023 F	024	025
HD03 DIOXIN, 2378-TETRACHLORODIBENZO-P, WIPE	PGCM2	0.400	UV:0.400	UV:0.400	UV:0.400	UV:0.400
ZZ01 SAMPLE NUMBER	NA	021	V:022	V:023	V:024	V:025
ZZ02 ACTIVITY CODE	NA	GZ1AL	V:GZ1AL	V:GZ1AL	V:GZ1AL	V:GZ1AL
ZZ11 ANALYSIS DATE (MM/DD/YY) - ANALYSIS TIM		09/12/96 1850	09/13/96 1630	09/12/96 1919	09/13/96 1741	09/13/96 1755

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## ANALYSIS REQUEST DETAIL REPORT

ACTIVITY: 6-GZ1AL

VALIDATED DATA

COMPOUND

UNITS

026

HD03 DIOXIN, 2378-TETRACHLORODIBENZO-P, WIPE	PGCM2	0.400	UV			
ZZ01 SAMPLE NUMBER	NA	026	V			
ZZ02 ACTIVITY CODE	NA	GZ1AL	V			
ZZ11 ANALYSIS DATE (MM/DD/YY) - ANALYSIS TIM		09/26/96 0133				

11-1



VALIDATED DATA

ACTIVITY GZ1AL      BRISTOL STEEL

THE PROJECT LEADER SHOULD CIRCLE ONE - STORET, AIRS, OR ARCHIVE.

CIRCLE ONE:      STORET      AIRS      ARCHIVE

FINAL DATA REPORT APPROVED BY PROJECT LEADER ON 10/01/96 16:12:24 BY Donald P. Hamner

21-1